

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF NSTAR GAS COMPANY TO THE  
DIVISION OF PIPELINE ENGINEERING AND SAFETY**

D.T.E. 05-36

November 16, 2005

Persons Responsible: Christopher Bourne

Information Request NSTAR 1-51

With reference to page 28 of the Incident Report issued by the Division on November 6, 2003, the Division indicates that “NSTAR is correct in its interpretation of the regulation [49 C.F.R. § 192.481] in that replacement of all underground piping for 65 Main Street with plastic relieved NSTAR of the burden of corrosion monitoring and protection.” Please provide a copy of all documents and citations to applicable regulations and rulings that form the basis of the Division’s conclusion.

Response

The requirements for corrosion control are contained in Subpart I of 49 C.F.R. Part 192. The scope of this subpart is in 49 C.F.R. § 192.451: Scope which states:

“(a) This subpart prescribes minimum requirements for the protection of **metallic** pipelines from external, internal, and atmosphere corrosion.” (Emphasis added.)

Plastic is not a metallic substance. Plastic pipelines are not metallic pipelines. Therefore, they are not subject to the corrosion protection requirements in Subpart I of 49 C.F.R. Part 192, including those in 49 C.F.R. § 192.481.